

FILED
U.S. DISTRICT COURT
MIDDLE GEORGIA

2009 APR 28 PM 12 42
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Middle District of Georgia Albany Division

Rodney L. Jackson
Plaintiff

VS

Defendant

1:09-cv-64(WLS)

Federal Bureau of Prisons
Federal Correctional Institution in Beckley, West Virginia and
Marty C. Anderson, Warden at FCI Beckley

Complaint

Comes, now Rodney L. Jackson In pro, se and according to the Federal rules of civil procedure submits that plaintiff cause of action under the eight Amendment of the Constitution of the United States of America.

“Excessive bail shall not be required, nor excessive fine imposed nor cruel and unusual punishments inflicted.”

Plaintiff states that his civil rights under the 8th Amendment were blatantly violated by warden Marty C. Anderson and medical staff of FCI Beckley prison by not adequately addressing plaintiff. Health problems, eight Amendment protections against elaborate, deliberate scheme of indifference to prisoners' health problems extend to condition that threaten to cause health problems in the future as well as current serious health problems. See (Wilson v. Seiter 501 U.S. 294, 111 S. ct 2321, 115 ED. 2D 271(1991), Estelle v. Gamble 429 U.S. at 103-104, 97 S. ct. at 290-291. “In Estelle, we concluded that although Accidental or Inadvertent failure to provide adequate medical care to a prisoner would not violate the eight Amendment, “deliberate Indifference to serious medical needs of prisoners violates the Amendment because it constitutes the unnecessary and wanton Infliction of pain contrary to contemporary standards of decency”.

Plaintiff submits a chronological record of his medical care as Exhibit (A). Exhibit (B) demonstrates plaintiff complying with the proper chain of commands and their responses. Exhibit (C) Provides reasonable reasoning of why plaintiff was singled out for such Harsh and Cruel Treatment. Exhibit (D) establishes fact that plaintiff should have had surgery several years, prior to serious medical complications getting worse. Plaintiff now suffers from permanent psychological and physical injuries due to harsh and cruel treatment, perpetrator knowingly by defendant for years. Plaintiff was used as experimental subject, by being prescribed medications that worsen his condition rather treating or making him better. Plaintiff due to neglect by

defendant and unusual and cruel treatment, plaintiff wife divorced him because plaintiff could no longer perform his husband duty sexually.

Wherefore Plaintiff respectfully request a sum of 25,000,000 Twenty-five million dollars, for physical, Psychological, mental anguish, and punitive damages also, for future medical complications stemming from this travesty of justice.

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In Pro, se

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